

EXHIBIT C

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October 26, 2022

BY EMAIL

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QUINN EMANUEL URQUHART & SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
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Re: *In re Alta Mesa Resources, Inc. Securities Litigation*, Case No. 19-cv-00957

Dear Counsel:

We write regarding your October 3, 2022 request to claw back three documents inadvertently produced to plaintiffs: HPS_00062829, HPS_00064772, and HPS_00073316. These documents were apparently part of HPS volumes 005 and 006, which were produced by HPS in an unidentified “separate proceeding” but almost entirely withheld from your production in this matter.

As you know, we requested on October 5, 2022 that you state “the basis of your claim that these [three] documents should not have been produced.” You have not asserted that the documents are subject to any claim of privilege or immunity. Nor do you contend that the documents are not relevant to any claim or defense. Rather, you assert that two of the documents, HPS_00064772 and HPS_00073316, “fall outside the parties’ agreed search parameters in this matter.” This is not a valid basis to claw back relevant, non-privileged documents. The narrow search parameters applicable to HPS documents in this matter were negotiated ostensibly to reduce the burden on HPS; there is no burden in not clawing back relevant documents.

Furthermore, as you have tacitly admitted, HPS_00062829 is not only relevant, but within the agreed-upon search parameters in this matter. This underscores the question, why does HPS believe the balance of volumes HPS005 and HPS006 of its production in the related matter should not be produced to the class plaintiffs? There is no burden to HPS in producing documents that have already been reviewed and produced in the related matter, and HPS’s inadvertent production has demonstrated that these volumes include documents relevant to this matter, both within and outside of the previously negotiated search parameters.

We request that you immediately produce in this matter the balance of volumes 5 and 6, i.e., HPS_00051014 through HPS_00073711. If you will not, please state the basis for your refusal, so that we may prepare a joint letter to Judge Hanks.

Page 2 of 2

Very Truly Yours,

/s/ Brendan J. Brodeur

ENTWISTLE & CAPPUCCI LLP

/s/ Trig Smith

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